CENTRAL VERMONT REGIONAL PLANNING COMMISSION



April 12, 2005

Ms. Susan Hudson, Clerk Vermont Public Service Board 112 State Street, Drawer 20 Montpelier, VT

SUBJECT: CVRPC Testimony re: VELCO's Petition for a Certificate of Public Good for Lamoille County 115kV Project (Docket #7032)

Dear Ms. Hudson:

I am submitting the attached Prefiled Testimony on behalf of the Central Vermont Regional Planning Commission with the understanding that it comes after the deadline, but with the following explanation:

On Thursday, April 7, 2005, concerned that I had missed notice of an impending deadline in the shear volume of paper this project has generated, I telephoned the Public Service Board and asked if a deadline had been set for prefiled testimony. I was informed that no such date had been set. On Tuesday, April 12, 2005 upon receiving several pieces of prefiled testimony, my concern returned. I again telephoned the Public Service Board and spoke to the same person who recalled our earlier conversation, and told me that she had made a mistake and that the deadline had, in fact, been the previous day. I was encouraged to submit CVRPC's testimony with an explanatory note and a request that it be accepted late. This letter is that request.

Several volunteers on CVRPC's Project Review Committee have given of their time and energy to review this proposal. I believe it would be unfair to disqualify their efforts under the unusual circumstances described above. Thank you for your consideration.

Sincerely,

Chris Walsh Senior Planner

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CENTRAL VERMONT REGIONAL PLANNING COMMISSION



April 11, 2005

Ms. Susan Hudson, Clerk Vermont Public Service Board 112 State Street, Drawer 20 Montpelier, VT

SUBJECT: CVRPC Testimony re: VELCO's Petition for a Certificate of Public Good for Lamoille County 115kV Project (Docket #7032)

Dear Ms. Hudson:

Please accept the following comments as CVRPC's prefiled direct testimony on the above referenced case:

On April 7, 2005 CVRPC's Project Review Committee met to develop a position on the proposed project regarding its conformance with the goals and policies of the Central Vermont Regional Plan.

It was the Committee's conclusion that the energy shortage the project is intended to address represents a genuine problem and that the project does conform with the Regional Plan and its overall goal regarding electric power. "To promote the upgrading, improvement and expansion of electric power generation methods and infrastructure so as to provide adequate service, conserve energy, maximize public investment, and protect public health." This conclusion, however, is not intended to imply that the Committee believes that the project, as proposed, represents the best solution available. In fact, CVRPC has a number of concerns and reservations regarding the proposal. Among these are:

1. A concern that the project and its attendant controversies are the result of inadequate long term planning. The applicant has represented to CVRPC that the need for the project has been recognized for 15-20 years, and further, that the life of the proposed project covers approximately the same span. Safeguards and conditions should be put in place in the Certificate of Public Good to ensure that we do not find ourselves in a similar position in 2020 - forced to respond to a "crisis" energy shortage that could have been better anticipated and planned for.

- 2. A concern that the notion of rerouting the line through Mount Mansfield State Forest has not been adequately or exhaustively explored. While the Central Vermont Regional Plan generally endorses the concept of using existing corridors, it does recognize "that existing routes may not always be optimal for additional or expanded transmission lines." The Committee believes that this may be such a case.
- CVRPC recognizes the impacts on individual landowners and neighborhoods.
 Accordingly we wish to emphasize that our finding of "conformance" does not imply that site specific mitigation measures need not be employed where warranted and feasible.

Thank you for the opportunity to comment on this matter.

Sincerely

Chris Walsh Senior Planner

On behalf of the CVRPC Project Review Committee